

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) No. 4:23 MJ 8314 SRW
)
 ERIC WASHINGTON,)
)
 Defendant.)

SUPPLEMENTAL MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Ashley M. Walker, Assistant United States Attorney for said District, and moves the Court to order Defendant Andrew C. Hubbard detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Title 18, United States Code, Section 3142(g) provides factors that the Court must consider in determining whether to order Defendant detained pending trial. These factors include: (a) the nature and circumstances of the offense charged; (b) the weight of the evidence against Defendant; (c) Defendant's criminal history and characteristics; and (d) the danger that would be posed by Defendant's release to any particular individual or the community as a whole.

2. Defendant is currently charged by complaint with possessing ammunition as a previously convicted felon, in violation of 18 U.S.C. § 922(g)(1).

3. This charge stems from a federal search warrant that was executed on October 11, 2023, at Defendant's residence at 7010 Idlewild Ave, Jennings, Missouri 63136. While searching

the residence, investigators located and seized multiple rounds of ammunition from the Defendant's bedroom: Winchester manufactured .38 caliber rounds head stamped Winchester 38 SPL; and .38 caliber rounds head stamped R-P 38 SPL.

4. The federal search warrant was conducted as part of an ongoing homicide investigation by the St. Louis Metropolitan Police Department, with assistance from the Federal Bureau of Investigation (FBI). In the early morning hours of July 7, 2023, SLMPD officers were alerted to a "Person Down" in the alley of the 4400 block of Kennerly Avenue. There, responding officers discovered victim AW deceased after suffering multiple apparent gunshot wounds.

5. After learning victim AW's cellphone number, investigators obtained call records and identified the cellphone numbers that communicated with victim AW's cellphone in the hours leading up to her murder. One of those numbers belonged to Defendant, who investigators learned was victim's nephew.

6. Investigators also obtained state-level search warrants for tower/area cellular data from three points critical to the investigation: (1) victim AW's residence; (2) a point along the path victim AW's device travelled from her residence to the location where her body was recovered, and (3) the place where her body was recovered. From that data, investigators were able to identify two potential suspects based on cellular devices that were with victim AW's cellular device at or near the same time at all three points. One of those suspects was the Defendant, Eric Washington.

7. Investigators also learned that four days after victim AW was murdered, the victim's son submitted a claim on a life insurance policy he had obtained in 2019. Victim AW was the insured on the policy and her son, owner of the policy, was listed as the sole beneficiary.

8. Further investigation determined that the Defendant was aware of this policy prior to the victim's death and conspired with the victim's son to develop a plan and subsequently kill this victim for payment from the insurance police.

9. Cellular data and other investigative tactics produced evidence that after the murder the Defendant subsequently called the sales agent of the insurance police to determine when the policy would be paid to the victim's son as the victim's son owed the Defendant money.

10. Defendant's criminal history further demonstrates that he is a dangerous individual. Defendant has prior felony convictions for possession of a controlled substance and distribution of, or possession with the intent to distribute, a controlled substance.

11. Given the facts supporting Defendant's current charge, coupled with a crime for which a federal investigation is ongoing in which the Defendant is the suspected shooter of the victim AW, there is no condition or combination of conditions that would assure the community's safety if Defendant were to be released pending trial.¹

WHEREFORE, the Government requests that this Court order Defendant detained prior to trial, and further order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Ashley M. Walker
ASHLEY M. WALKER #67175MO
Assistant United States Attorney
Thomas F. Eagleton Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200

¹ The Government anticipates charges relative to the murder to be forthcoming.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of this document was filed with the Court's electronic file management system for service upon all parties and counsel of record on October 13, 2023

s/Ashley M. Walker
ASHLEY M. WALKER, #67175MO
Assistant United States Attorney